

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JAIME HAWN

Plaintiffs

vs.

VITAS HEALTHCARE

Defendant

CASE NO. 1:19-cv-220

Judge Michael R. Barrett

Magistrate Stephanie Bowman

**JOINT MOTION TO VACATE THE
SCHEDULING ORDER AND RESET
THE DEADLINES**

Plaintiff and Defendant, by and through counsel, hereby request this Honorable Court to Vacate and Reset all Deadlines. A Memorandum in Support is attached hereto and incorporated herein by reference.

Respectfully submitted,

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MEMORANDUM

Since May 2019, both parties have been diligently engaged in the discovery process, had have taken four depositions, including two in Miami Florida. Depositions are still ongoing, however, after the latest deposition was completed both parties decided it is in their client's best interest to attempt a mediation of this matter. A mediation has been scheduled with former U.S. Magistrate Judge Robert Steinburg.

If the mediation is not successful, there will still be depositions which need to be taken and given that some of the potential deponents are located out of state, they will not all be able to be held on the same day.

The parties are requesting that the discovery deadline be moved from January 31, 2020 until April 30, 2020 and that the dispositive motion deadline be moved from February 28, 2020, until May 29, 2020.

It is for these reasons that the parties jointly request that the remaining scheduling order be vacated. The Deadline for Discovery be Reset from January 31, 2020 until April 30, 2020 and the Dispositive Motion Deadline be reset from February 28, 2020 until May 29, 2020.

CONCLUSION

For reasons set forth above, this honorable Court should Grant the Joint Motion to Vacate the Current Scheduling Order and Reset the Deadlines.

CERTIFICATE OF SERVICE

This document was served to all parties by the Court's Electronic Filing System.

/s/ **Robert F. Croskery**
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